

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

V.

CYRUS ALLEN AHSANI, and  
SAMAN AHSANI,

Defendants.

§ § § § § § § § §

No. 19-CR-147

(The Honorable Vanessa D. Gilmore)

## **MOTION TO INTERVENE AND UNSEAL JUDICIAL RECORDS**

The Financial Times Ltd., publisher of a range of business news titles, including the *Financial Times* newspaper and the FT.com website, Global Investigations Review, and The Guardian (collectively, the “Media Intervenors”) hereby move for leave to intervene in the above-captioned case for the limited purpose of seeking an order unsealing judicial records and opening judicial proceedings in this matter. This Motion is made on the grounds that:

1. As news organizations, the Media Intervenors may intervene for the limited purpose of seeking an order unsealing court documents and opposing court closure.
2. The Media Intervenors have a First Amendment right to access court proceedings and judicial records filed with the Court in this matter, and said constitutional right is not overcome.
3. The Media Intervenors have a common law right to access court proceedings and judicial records filed with the Court in this matter, and said common law right is not overcome.
4. To the extent compelling interests overcome the Media Intervenors' constitutional and common law rights of access as to any portion of the sealed records and closed proceedings

in this matter, any sealing or closure must be no broader than necessary to serve those interests and must be supported by specific, on-the-record factual findings.

This Motion is based on the concurrently filed Memorandum of Law in Support of the Motion to Intervene and Unseal, all pleadings, records, and files in the above-captioned case, all matters of which the Court shall take judicial notice, and on such argument as may be presented at a hearing on this Motion.

### **RELIEF SOUGHT**

The Media Intervenors respectfully request that the Court grant their motion to intervene and enter an order unsealing all sealed records and opening all closed judicial proceedings in this matter to the public, including Defendants' forthcoming sentencing proceedings.

Dated: June 19, 2020

Respectfully submitted,

/s/ Katie Townsend

Katie Townsend  
Madeline Lamo\*

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\*Pro Hac Vice Application Forthcoming

**CERTIFICATE OF CONFERENCE**

I certify that I contacted Dennis Kihm and Suzanne Elmilady, counsel for the United States in this matter, and Rachel Gagnebin Talay, counsel for Defendants, via e-mail on June 18, 2020, to ascertain their clients' position on the relief sought by this Motion. On June 19, 2020, I received an email from Angela Dodge, Public Affairs Officer for the U.S. Attorneys' Office for the Southern District of Texas, stating: "We will file the appropriate responses in court. It would not be appropriate for us to elaborate further at this time." Counsel for Defendants did not respond.

/s/ Katie Townsend

Katie Townsend  
*Counsel for Proposed Intervenors  
The Financial Times, Ltd.,  
Global Investigations Review,  
and The Guardian*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically filed on June 19, 2020. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Katie Townsend

Katie Townsend  
*Counsel for Proposed Intervenors  
The Financial Times, Ltd.,  
Global Investigations Review,  
and The Guardian*